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6 Attorneys for Defendant
 THE CHILDREN'S PLACE RETAIL STORES, INC.

7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 OAKLAND DIVISION
 11

12 GALINA SEEBROOK, individually and on
 behalf of all others similarly situated,
 13
 Plaintiffs,
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 v.
 15
 THE CHILDREN'S PLACE RETAIL
 16 STORES, INC., a Delaware corporation,
 17
 Defendant.

Case No. 11-cv-00837-CW

CLASS ACTION

**STIPULATION AND [~~PROPOSED~~] ORDER
 RELATING CASES**

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1 Pursuant to Local Civil Rules 3-12, 7-11, and 7-12, counsel for plaintiff Galina Seebrook
2 in *Seebrook v. The Children’s Place Retail Stores, Inc.*, Case No. 11-cv-00837-CW
3 (“*Seebrook*”), counsel for plaintiff Maria Isabel Beltran in *The Children’s Place Retail Stores,*
4 *Inc., et al.*, Case No. 11-cv-01664-CRB (“*Beltran*”), and counsel for defendant The Children’s
5 Place Retail Stores, Inc. (“Children’s Place”) jointly submit the following Stipulation that the
6 above-captioned action, *Seebrook*, is related to the *Beltran* action.

7 **RECITALS**

8 **WHEREAS**, on February 28, 2011, plaintiff Galina Seebrook filed this putative class
9 action lawsuit against defendant Children’s Place in this Court;

10 **WHEREAS**, on March 9, 2011, plaintiff Maria Isabel Beltran filed the above-referenced
11 putative class action lawsuit against defendant Children’s Place in the Superior Court for the State
12 of California, County of San Francisco;

13 **WHEREAS**, on April 6, 2011, Children’s Place removed the *Beltran* action from the
14 Superior Court for the State of California, County of San Francisco, to the United States District
15 Court for the Northern District of California;

16 **WHEREAS**, on April 12, 2011, Children’s Place filed an Administrative Motion to
17 Consider Whether these Actions Should Be Related; and

18 **WHEREAS**, plaintiffs’ counsel and Children’s Place’s counsel agree that the *Seebrook* and
19 *Beltran* actions should be deemed “related” under Local Civil Rule 3-12.

20 **STIPULATION**

21 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and between the parties
22 hereto through their respective counsel of record, that the *Seebrook* and *Beltran* actions are
23 related within the meaning of Civil Local Rule 3-12.

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IT IS SO STIPULATED.

Dated: April 13, 2011

COOLEY LLP
MICHELLE C. DOOLIN (179445)
MAZDA K. ANTIA (214963)
JENNIFER M. FRENCH (265422)

/s/ Jennifer M. French
Jennifer M. French

Attorneys for Defendant
THE CHILDREN’S PLACE RETAIL STORES, INC.

Dated: April 13, 2011

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Attorneys for Plaintiff
GALINA SEEBROOK

Dated: April 13, 2011

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James R. Patterson

Attorneys for Plaintiff
MARIA ISABEL BELTRAN

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FILER'S ATTESTATION

Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that all parties have concurred in the filing of this Stipulation Regarding Deadline to Respond to Complaint.

Dated: April 13, 2011

COOLEY LLP
MICHELLE C. DOOLIN (179445)
MAZDA K. ANTIA (214963)
JENNIFER M. FRENCH (265422)

/s/ Jennifer M. French
Jennifer M. French

Attorneys for Defendant
THE CHILDREN'S PLACE RETAIL STORES,
INC.

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[PROPOSED] ORDER

Based on the foregoing, and good cause appearing, **IT IS HEREBY ORDERED** that the *Seebrook* and *Beltran* actions are related within the meaning of Civil Local Rule 3-12.

IT IS SO ORDERED.

Dated: **4/18/2011**



THE HONORABLE CLAUDIA WILKEN
UNITED STATES DISTRICT JUDGE